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VIA EMAIL AND CM/ECF

The Honorable Valerie Caproni
United States District Court for the Southern District of New York
40 Foley Square, Room 240
New York, NY. 10007

Re: *Clarke, et al. v. Manasseh Jordan Ministries, Inc., et al.*
USDC SDNY Case No. 16-cv-01859 (VEC)

Dear Judge Caproni:

We represent defendants Manasseh Jordan Ministries, Inc., Prophet Manasseh Products and Yakim Manasseh Jordan (collectively "Defendants") in the above-entitled action, and write pursuant to Rule 1E of Your Honor's Individual Practices and Rules.

Attached hereto please find a Stipulation and Proposed Order re Time for Defendants to Respond to Complaint ("Stipulation"). Defendants agreed to accept service of the Complaint effective March 28, 2016 in exchange for Plaintiffs agreeing to give Defendants a 30-day extension to respond to the Complaint so that they may have sufficient time to investigate the matter before responding to the Complaint, and to potentially discuss resolving the matter with Plaintiffs' counsel. As such, the Stipulation states that the Defendants shall have through and including May 18, 2016 to answer or move in response to the Complaint.

Pursuant to Your Honor's rules, a copy of this letter will be sent to opposing counsel, and will also be electronically filed to the docket in the above-entitled action, as well as sent to Your Honor via email at CaproniNYSDChambers@nysd.uscourts.gov.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Daniel S. Silverman", with a long, sweeping horizontal line extending to the right.

Daniel S. Silverman
(*pro hac vice* admission forthcoming)

DSS:rlr
Enclosure

cc: Joshua D. Arisohn, plaintiffs' counsel of record (via email)